SMITH & LOWNEY, P.L.L.C.
2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883, FAX (206) 860-4187

January 26, 2016

Via Certified Mail - Return Receipt Requested
Managing Agent
BP West Coast Products LLC
1652 SW Lander St.
Seattle, WA 98134

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

We represent Puget Soundkeeper Alliance, 130 Nickerson Street, Suite 107, Seattle, Washington 98109, (206) 297-7002. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days' notice of Puget Soundkeeper Alliance's intent to file a citizen suit against BP West Coast Products LLC ("BP") under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by BP's National Pollution Discharge Elimination System ("NPDES") permit.

BP was granted coverage under Washington's Industrial Stormwater General Permit issued by the Washington Department of Ecology ("Ecology") on August 21, 2002, effective September 20, 2002, modified on December 1, 2004, reissued on August 15, 2007, effective September 15, 2007, reissued again on October 15, 2008, effective November 15, 2008, and remaining effective through December 31, 2009, under NPDES Permit No. SO3-005603 (the "2002 Permit"). BP was granted coverage under the subsequent iteration of the Washington Industrial Stormwater General Permit issued by Ecology on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012 (the "2010 Permit") and the iteration issued December 3, 2014, effective January 2, 2015 and set to expire December 31, 2019 (the "2015 Permit"), under NPDES Permit No. WAR005603.

BP has violated and continues to violate the CWA (see Sections 301 and 402 of the CWA, 33 USC §§ 1311 and 1342) and the terms and conditions of the 2010 Permit, and 2015 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and other pollutants from, its petroleum bulk facility located at or about 1652 SW Lander St., Seattle, WA 98134 (the "facility") as described herein. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by BP.

I. COMPLIANCE WITH STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the 2010 and 2015 Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter.") Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard.

BP discharges to the Duwamish Waterway and Elliott Bay directly and via a stormwater drainage system, including catch basins. BP discharges stormwater that contains elevated levels of solids, turbidity, copper, zinc, cadmium, mercury, bacteria, including fecal coliform, and PCBs, including as indicated in the table of benchmark excursions below, and as discussed in section II of this notice letter. These discharges cause and/or contribute to violations of water quality standards for turbidity, copper, zinc, sediment bioassay, cadmium, mercury, bacteria, PCBs, and aesthetic values in the receiving waters and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. Precipitation data from King County International Airport for that time period is appended to this notice of intent to sue and identifies these days.

Table 1: Permit Benchmark Excursions

Quarter in which sample collected	Zn Concentration (Benchmark 117 µg/L)	Cu Concentration (Benchmark 14 µg/L)	Turbidity (Nephelometric turbidity units (NTU))
2nd Quarter 2010	310.5 ug/L	34.5 µg/L	
3rd Quarter 2010	280		
2nd Quarter 2011		15	
4th Quarter 2011	185	20.5	
1st Quarter 2012	770	133	46 NTU
2nd Quarter 2012	190	17	
4th Quarter 2012		17	37
3rd Quarter 2013		15	
3rd Quarter 2014	130	18	
4th Quarter 2014		100	
2nd Quarter 2015	150		
3rd Quarter 2015	140	15.5	
4th Quarter 2015		18	

B. Compliance with Standards.

Condition S10.C of the 2010 and 2015 Permits require BP to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparation and implementation of an adequate SWPPP and best management practices ("BMPs"). BP has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in the table above and as described below in this notice of intent to sue.

Condition S1.A of the 2010 and 2015 Permits require that all discharges and activities authorized be consistent with the terms and conditions of the permits. BP has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

II. NUMERIC EFFLUENT LIMITATION VIOLATIONS.

Condition S6.C.1.b of the 2010 Permit and condition S6.C.1. of the 2015 Permit require BP's discharges to comply with a maximum daily effluent limitation for total suspended solids (TSS) of 30 mg/L. BP violated condition S6.C.1.c by discharging concentration of TSS in excess of 30 mg/L on the dates shown in Table 2 below:

Table 2: TSS Numeric Effluent Limit Violations

Sample date	TSS concentration (mg/L) (daily maximum limit: 30 mg/L)
August 29, 2015	33
October 7, 2015	33

In addition to the dates identified above, BP has violated the condition S6.C.1 TSS effluent limit of the Permits each day during the last five years during which there was 0.1 inch of precipitation or more at the facility. Precipitation data from King County International Airport for that time period is appended to this notice of intent to sue and identifies these days.

III. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

Condition S3.A.1 of the 2010 and 2015 Permits require BP to develop and implement a SWPPP as specified. Condition S3.A.2 of the 2010 and 2015 Permits require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. BP has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to ensure its discharges do not cause or contribute to violations of water quality standards.

Condition S3.A of the 2010 and 2015 Permits require BP to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. BP has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented and has not been updated as necessary.

The facility's SWPPP fails to satisfy the requirements of Condition S3 of the 2010 and 2015 Permits because it does not adequately describe BMPs. Condition S3.B.4 of the 2010 and 2015 Permits require that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A.3 of the 2010 and 2015 Permits require that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. BP's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

BP's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the 2010 and 2015 Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours and seasonal variations in business hours or in industrial activities as required.

BP's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the 2010 and 2015 Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

BP's SWPPP fails to comply with Condition S3.B.2.b of the 2010 and 2015 Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and

roofs or other surfaces composed of materials that may be mobilized by stormwater as required by this condition.

BP's SWPPP does not comply with Condition S3.B.2.c of the 2010 and 2015 Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as this permit condition requires.

BP's SWPPP does not comply with Condition S3.B.3 of the 2010 and 2015 Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

Condition S3.B.4 of the 2010 and 2015 Permits requires that permittees include in their SWPPPs and implement certain mandatory BMPs no later than July 1, 2010 unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP is provided. BP is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the 2010 and 2015 Permits.

BP's SWPPP does not comply with Condition S3.B.4.b.i of the 2010 and 2015 Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how BP will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit).

BP's SWPPP does not comply with Condition S3.B.4.b.i.7 of the 2010 and 2015 Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

BP's SWPPP does not comply with Condition S3.B.4.b.ii of the 2010 and 2015 Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. BP's SWPPP does not comply with Condition S3.B.4.b.iii of the 2010 and 2015 Permits because it does not include treatment BMPs as required.

BP's SWPPP fails to comply with Condition S3.B.4.b.v of the 2010 and 2015 Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

BP's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the 2010 and 2015 Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, and discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantitation levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

IV. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the 2010 and 2015 Permits require BP to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the 2010 and 2015 Permits require BP to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

BP violated these requirements by failing to collect stormwater samples at any of its discharge points during third quarter of 2012.

BP has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site. BP has multiple distinct points of discharge that are known to it and all must be sampled under the 2010 and 2015 Permits' Condition S4.B. except for particular points of discharge that are properly deemed substantially identical to another, specific point of discharge. These violations have occurred and continue to occur each and every quarter during the last five years that BP was and is required to sample its

stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not each, point of discharge. These violations will continue until BP commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples.

Conditions S5.A.1 and S6.C of the 2010 and 2015 Permits require BP to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, oil sheen, and TSS. Condition S5.B of the 2015 Permit requires BP to analyze stormwater samples for petroleum hydrocarbons (Diesel Fraction). Condition S9.A. of the 2010 and 2015 Permits require BP to submit the sampling data it obtained each quarter to Ecology on a discharge monitoring report (DMR). BP violated condition S5.A.1 and S9.A. of the 2010 Permit by failing to analyze its stormwater samples for TSS in all four quarters of 2010, 2011, 2012, 2013, and 2014, and for oil sheen in the second and third quarters of 2010 and first and second quarters of 2011, and report the data it obtained to Ecology on DMRs.

C. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the 2010 and 2015 Permits require that monthly visual inspection be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional of different BMPs are needed).

Condition S7.C of the 2010 and 2015 Permits require that BP record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the 2010 and 2015 Permits, a summary report and schedule of implementation of the remedial actions that BP plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

BP is in violation of these requirements of Condition S7 of the 2010 and 2015 Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

V. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements of the 2010 and 2015 Permits.

Condition S8.B of the 2010 and 2015 Permits require BP take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH.

As described by Condition S8.B of the 2010 and 2015 Permits, a Level One Corrective Action requires BP: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 and 2015 Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 and 2015 Permits; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the 2010 and 2015 Permits. Condition S8.B.4 of the 2010 and 2015 Permits require BP implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Table 2 of the 2010 and 2015 Permits establish the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 µg/L; total zinc 117 µg/L; no oil sheen. Condition S5.B and Table 3 of the 2015 Permit establish the following additional benchmark that is applicable to BP: 10 mg/L petroleum hydrocarbons (Diesel Fraction).

BP has violated the requirements of the 2010 and 2015 Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since January 1, 2010, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 above.

B. Violations of the Level Two Requirements of the 2010 and 2015 Permits.

Condition S8.C of the 2010 and 2015 Permits requires BP take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any two quarters during a calendar year.

As described by Condition S8.C of the 2010 and 2015 Permits, a Level Two Corrective Action requires BP: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 and 2015 Permits; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 and 2015 Permits; and (3)

summarize the Level Two Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the 2010 and 2015 Permits. Condition S8.C.4 of the 2010 and 2015 Permits requires BP implement the revised SWPPP according to condition S3 of the 2010 and 2015 Permits and the applicable stormwater management manual as soon as possible, and no later than September 30 of the following year for corrective actions triggered in 2010 and 2011, and otherwise (for corrective actions triggered in 2012 or thereafter) no later than August 31st of the following year.

The 2010 and 2015 Permits establish the benchmarks applicable to BP described in section IV.A of this notice of intent to sue letter.

BP has violated the requirements of the 2010 and 2015 Permits described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, including additional structural source control BMPs, and the required summarization in the annual report each time since January 1, 2010, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any two quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, BP's failure to fulfill these obligations for zinc triggered by its stormwater sampling during calendar years 2010, 2012 and 2015; for copper triggered by its stormwater sampling during calendar year 2011, 2012, 2014, and 2015; and for turbidity triggered by its sampling during calendar year 2012.

C. Violations of the Level Three Requirements of the 2010 Permit.

Condition S8.D of the 2010 and 2015 Permits requires BP take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year.

As described by Condition S8.D of the 2010 and 2015 Permits, a Level Three Corrective Action requires BP: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 and 2015 Permits; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 and 2015 Permits; and (3) summarize the Level Three Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the 2010 and 2015 Permits, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or it new/additional treatment BMPs will be installed. Condition S8.D.2.b of the 2010 and 2015 Permits requires that a licensed professional engineer, geologist, hydrogeologist, of certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the 2010 and 2015 Permits requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, the BP submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the 2010 and 2015 Permits require BP fully implement the revised SWPPP according to condition S3 of the 2010 and 2015 Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The 2010 and 2015 Permits establish the benchmarks applicable to BP described in section IV.A of this notice of intent to sue letter.

BP has violated the requirements of the 2010 and 2015 Permits described above by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, including the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment, the required implementation of additional BMPs, including additional treatment BMPs, the required submission of an engineering report, plans, specifications, and an operations and maintenance plan, and the required summarization in the annual report each time since January 1, 2010, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any three quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, BP's failure to fulfill these obligations for copper triggered by its stormwater sampling during calendar year 2012.

VI. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the 2010 and 2015 Permits requires BP to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Condition S8.B – D. If a corrective action is not yet completed at the time of submission of the annual report, BP must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date BP expects to complete corrective actions.

BP has violated this condition. The annual reports submitted by BP for 2010, 2011, 2012, 2013, and 2014 do not include the required information. The reports do not describe all of the stormwater problems identified, and there is no detailed description of additional operational and structural source control BMPs BP implemented or plans to implement as part of its Level 1, 2 and 3 corrective actions. In addition, BP's 2010, 2011 and 2014 annual reports fail to identify and describe Level 1 corrective actions addressing the multiple benchmark exceedances those year, BP's 2012 annual report fails to identify corrective actions taken, if any, and BP's 2013 annual report erroneously indicates no corrective actions were triggered in 2013.

VII. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the 2010 and 2015 Permits require BP record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if BP collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why BP could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. BP is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the 2010 and 2015 Permits requires BP to retain for a minimum of five years a copy of the 2010 and 2015 Permit, respectively, a copy of BP's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the 2010 and 2015 Permit. Upon information and belief, BP is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

VIII. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit, Soundkeeper hereby requests that BP West Coast Products LLC provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should BP fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the Permit, it will be in violation of that condition, which violation shall also be subject to this notice of intent to sue and any ensuing lawsuit.

IX. DOCUMENT RETENTION/LITIGATION HOLD

This notice of Soundkeeper's intent to sue confers a duty on BP, its agents and representatives to preserve all records that are potentially relevant to any ensuing litigation. It is crucial that you take affirmative steps to preserve documents and electronically stored information that are relevant to this dispute and that are in your custody or control. We request that you preserve paper records and electronically stored information, including email, electronic calendars, financial spreadsheets, Word documents, and other information created and/or stored on BP computers or computers belonging to employees, agents or representatives relating to any issues relevant to this litigation. The above list is intended to give examples of the types of records you should retain. It is not an exhaustive list. The time period at issue in this litigation is 2010 to the present, which is a good starting point to assess the materials you should preserve. If BP has a records retention schedule in place, you are requested to suspend compliance with the records retention schedule (which might otherwise dictate that you discard certain records) for those documents and electronically stored information that you determine are relevant. Do not discard documents or electronically stored information that is relevant. Do not delete, overwrite, alter, or destroy such materials. Please also notify your IT staff of this litigation hold as well.

X. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Puget Soundkeeper Alliance. These violations are ongoing. Puget Soundkeeper Alliance intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to $37,500 per day for each violation. In addition to civil penalties, Puget Soundkeeper Alliance will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Puget Soundkeeper Alliance believes that this Notice of Intent to Sue sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against BP Company, Inc. under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Sincerely,

SMITH & LOWNEY, PLLC

By: _____
Claire E. Tonry

cc: Gina McCarthy, Administrator, U.S. EPA
Dennis McLerran, Region 10 Administrator, U.S. EPA
Maia Bellon, Director, Washington Department of Ecology
CT Corporation System, Registered Agent (505 Union Ave. SE, Ste. 120, Olympia, WA 98501)

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
2010	Precip. (in)	24	0.11	5	0.14
Jan	sum	25	0.06	6	0
15	0.52	26	0.49	7	0.11
16	0.02	27	0.09	8	0.09
17	0.12	28	0	9	0.07
18	0	2010	Precip. (in)	10	0
19	0.02	Mar	sum	11	0
20	0.01	1	0	12	0
21	0	2	0.06	13	0.08
22	0	3	0	14	0
23	0.01	4	0	15	0
24	0.35	5	0	16	0.01
25	0.12	6	0	17	0.18
26	0	7	0.05	18	0.01
27	0	8	0.04	19	0
28	0	9	0	20	0.01
29	0.02	10	0.03	21	0.65
30	0.2	11	0.49	22	0
31	0.06	12	0.57	23	0.11
2010	Precip. (in)	13	0.01	24	0.01
Feb	sum	14	0	25	0
1	0.06	15	0.01	26	0.29
2	0.02	16	0.06	27	0.29
3	0.27	17	0.01	28	0.26
4	0.08	18	0	29	0
5	0.08	19	0	30	0.03
6	0.24	20	0	2010	Precip. (in)
7	0.09	21	0.03	May	sum
8	0	22	0	1	0
9	0	23	0	2	0.08
10	0.08	24	0	3	0.09
11	0.23	25	0.43	4	0.44
12	0.43	26	0	5	0.2
13	0.23	27	0	6	0
14	0.66	28	0.65	7	0
15	0.04	29	0.83	8	0
16	0.19	30	0.08	9	0
17	0	31	0.01	10	0.16
18	0	2010	Precip. (in)	11	0.01
19	0	Apr	sum	12	0
20	0	1	0.08	13	0
21	0	2	0.68	14	0
22	0	3	0.17	15	0
23	0.14	4	0.08	16	0

Date		Precipitation (inches)	Date		Precipitation (inches)	Date		Precipitation (inches)
	17	0.01		28	0		7	0.16
	18	0.18		29	0		8	0.01
	19	0.28		30	0		9	0
	20	0.13		2010	Precip. (in)		10	0
	21	0.04	Jul		sum		11	0
	22	0.09		1	0.02		12	0
	23	0.18		2	0.17		13	0
	24	0		3	0		14	0
	25	0.07		4	0.07		15	0
	26	0.28		5	0		16	0
	27	0.04		6	0		17	0
	28	0.3		7	0		18	0
	29	0.04		8	0		19	0
	30	0.08		9	0		20	0
	31	0.22		10	0		21	0.01
	2010	Precip. (in)		11	0		22	0
Jun		sum		12	0		23	0
	1	0.07		13	0		24	0
	2	0.21		14	0		25	0
	3	0.01		15	0		26	0
	4	0.29		16	0		27	0
	5	0.04		17	0		28	0
	6	0.26		18	0		29	0
	7	0.06		19	0		30	0
	8	0.23		20	0		31	0.37
	9	0.22		21	0		2010	Precip. (in)
	10	0.08		22	0	Sep		sum
	11	0.01		23	0		1	0
	12	0		24	0		2	0
	13	0		25	0		3	0
	14	0		26	0		4	0.02
	15	0.17		27	0		5	0
	16	0.22		28	0		6	0.12
	17	0		29	0		7	0.01
	18	0		30	0		8	0.25
	19	0.03		31	0		9	0.02
	20	0.17		2010	Precip. (in)		10	0
	21	0	Aug		sum		11	0
	22	0		1	0		12	0
	23	0		2	0		13	0
	24	0		3	0		14	0
	25	0		4	0		15	0.21
	26	0		5	0.04		16	0.44
	27	0		6	0		17	0.7

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
18	0.91	30	0.41	9	0.99
19	0.63	31	0.06	10	0
20	0	2010	Precip. (in)	11	1.37
21	0	Nov	sum	12	2.24
22	0	1	1.35	13	0.34
23	0.2	2	0	14	0.57
24	0.03	3	0	15	0.09
25	0	4	0	16	0.02
26	0.27	5	0.07	17	0
27	0.04	6	0.69	18	0.13
28	0.01	7	0.03	19	0.14
29	0	8	0	20	0.07
30	0	9	0.19	21	0.04
2010	Precip. (in)	10	0	22	0.02
Oct	sum	11	0.08	23	0.43
1	0	12	0	24	0.44
2	0	13	0.12	25	0.28
3	0	14	0.34	26	0.24
4	0	15	0.04	27	0.46
5	0	16	0	28	0
6	0.01	17	0.12	29	0
7	0	18	0.14	30	0
8	0.08	19	0.08	31	0
9	1.01	20	0.01	2011	Precip. (in)
10	0.92	21	0	Jan	sum
11	0	22	0.07	1	0
12	0	23	0	2	0
13	0.01	24	0	3	0
14	0.13	25	0.01	4	0.03
15	0	26	0.39	5	0.11
16	0	27	0.01	6	0.28
17	0	28	0.05	7	0.52
18	0	29	0.09	8	0.01
19	0	30	0.69	9	0.03
20	0.01	2010	Precip. (in)	10	0
21	0.01	Dec	sum	11	0.12
22	0.13	1	0	12	0.74
23	0.45	2	0.01	13	0.66
24	0.68	3	0	14	0.08
25	0.41	4	0	15	0.42
26	0.17	5	0	16	0.11
27	0	6	0	17	0
28	0.09	7	0.47	18	0.08
29	0.03	8	0.74	19	0

Date		Precipitation (inches)
	20	0.05
	21	0.68
	22	0
	23	0.04
	24	0.26
	25	0
	26	0
	27	0
	28	0.07
	29	0.26
	30	0
	31	0
	2011	Precip. (in)
Feb		sum
	1	0
	2	0
	3	0.02
	4	0.06
	5	0.09
	6	0.11
	7	0.06
	8	0.01
	9	0
	10	0
	11	0
	12	0.45
	13	0.28
	14	0.84
	15	0.15
	16	0.04
	17	0.02
	18	0
	19	0
	20	0
	21	0.06
	22	0.2
	23	0.08
	24	0.01
	25	0
	26	0
	27	0.51
	28	0.22
	2011	Precip. (in)
Mar		sum
	1	0.22
	2	0.14
	3	0.35
	4	0.12
	5	0
	6	0
	7	0
	8	0.1
	9	1.47
	10	0.41
	11	0
	12	0.47
	13	0.65
	14	0.3
	15	0.43
	16	0.22
	17	0
	18	0.18
	19	0
	20	0.01
	21	0.01
	22	0
	23	0
	24	0.04
	25	0.11
	26	0.08
	27	0.19
	28	0.11
	29	0.13
	30	0.09
	31	0.11
	2011	Precip. (in)
Apr		sum
	1	0.85
	2	0.25
	3	0.07
	4	0.12
	5	0.15
	6	0.1
	7	0.09
	8	0
	9	0
	10	0.09
	11	0.04
	12	0
	13	0.07
	14	0.39
	15	0.02
	16	0.15
	17	0
	18	0.02
	19	0
	20	0
	21	0.04
	22	0
	23	0
	24	0.05
	25	0.45
	26	0.03
	27	0.44
	28	0.04
	29	0.04
	30	0.17
	2011	Precip. (in)
May		sum
	1	0
	2	0.22
	3	0
	4	0
	5	0.04
	6	0.12
	7	0.04
	8	0.17
	9	0
	10	0
	11	0.51
	12	0
	13	0
	14	0.52
	15	0.69
	16	0
	17	0
	18	0
	19	0
	20	0
	21	0.1
	22	0
	23	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
24	0	3	0	14	0
25	0.24	4	0	15	0
26	0.04	5	0	16	0
27	0.09	6	0	17	0
28	0	7	0.01	18	0
29	0	8	0	19	0
30	0	9	0	20	0
31	0.06	10	0	21	0
2011	Precip. (in)	11	0	22	0.08
Jun	sum	12	0.09	23	0
1	0.24	13	0.01	24	0
2	0.25	14	0	25	0
3	0	15	0.04	26	0
4	0	16	0.33	27	0
5	0	17	0.06	28	0
6	0	18	0	29	0
7	0.1	19	0	30	0
8	0	20	0	31	0
9	0	21	0	2011	Precip. (in)
10	0	22	0	Sep	sum
11	0	23	0	1	0
12	0	24	0	2	0
13	0.03	25	0.27	3	0
14	0	26	0	4	0
15	0.11	27	0	5	0
16	0	28	0	6	0
17	0	29	0	7	0
18	0.3	30	0	8	0
19	0.03	31	0	9	0
20	0	2011	Precip. (in)	10	0
21	0	Aug	sum	11	0
22	0	1	0	12	0
23	0.01	2	0	13	0
24	0.12	3	0	14	0
25	0	4	0	15	0
26	0	5	0	16	0
27	0	6	0	17	0.21
28	0	7	0	18	0.13
29	0	8	0	19	0.06
30	0	9	0	20	0
2011	Precip. (in)	10	0	21	0
Jul	sum	11	0	22	0
1	0	12	0	23	0
2	0	13	0	24	0

Date		Precipitation (inches)
	25	0.22
	26	0.32
	27	0.04
	28	0.01
	29	0
	30	0.02
	2011	Precip. (in)
Oct		sum
	1	0
	2	0.14
	3	0.09
	4	0.02
	5	0.1
	6	0.19
	7	0.05
	8	0.01
	9	0.06
	10	0.18
	11	0.57
	12	0.01
	13	0
	14	0.01
	15	0
	16	0
	17	0
	18	0
	19	0
	20	0
	21	0.03
	22	0.28
	23	0
	24	0.02
	25	0
	26	0.01
	27	0
	28	0.38
	29	0
	30	0.14
	31	0
	2011	Precip. (in)
Nov		sum
	1	0
	2	0.42
	3	0
	4	0.06
	5	0
	6	0
	7	0.01
	8	0
	9	0
	10	0
	11	0.3
	12	0.15
	13	0.09
	14	0
	15	0
	16	0.38
	17	0.1
	18	0.01
	19	0
	20	0
	21	0.42
	22	1.58
	23	1
	24	0.35
	25	0
	26	0.03
	27	0.33
	28	0
	29	0.05
	30	0
	2011	Precip. (in)
Dec		sum
	1	0
	2	0
	3	0
	4	0
	5	0
	6	0
	7	0
	8	0
	9	0
	10	0.01
	11	0.05
	12	0
	13	0
	14	0.01
	15	0.03
	16	0
	17	0
	18	0.08
	19	0
	20	0
	21	0
	22	0
	23	0.01
	24	0.01
	25	0.04
	26	0.03
	27	0.03
	28	0.47
	29	0.21
	30	0.02
	31	0
	2012	Precip. (in)
Jan		sum
	1	0
	2	0.48
	3	0.03
	4	0.65
	5	0.08
	6	0.04
	7	0
	8	0
	9	0.17
	10	0.06
	11	0
	12	0
	13	0
	14	0.13
	15	0.23
	16	0.07
	17	0.09
	18	0.44
	19	0.32
	20	0.39
	21	0.06
	22	0.29
	23	0
	24	0.24
	25	0.4
	26	0.31

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
27	0	7	0	18	0.09
28	0	8	0	19	0.28
29	0.67	9	0.17	20	0.26
30	0.11	10	0.46	21	0
31	0.04	11	0.31	22	0
2012	Precip. (in)	12	0.66	23	0
Feb	sum	13	0.23	24	0.03
1	0.45	14	0.44	25	0.41
2	0	15	1.07	26	0.16
3	0	16	0.19	27	0.01
4	0	17	0.44	28	0
5	0	18	0.08	29	0.08
6	0	19	0.03	30	0.26
7	0	20	0.12	2012	Precip. (in)
8	0.1	21	0	May	sum
9	0.11	22	0.16	1	0.05
10	0.09	23	0	2	0
11	0	24	0	3	0.78
12	0.04	25	0	4	0.32
13	0.44	26	0	5	0
14	0.04	27	0.21	6	0
15	0	28	0.15	7	0
16	0.04	29	1.15	8	0
17	0.4	30	0.08	9	0.01
18	0.18	31	0	10	0
19	0	2012	Precip. (in)	11	0
20	0	Apr	sum	12	0
21	0	1	0	13	0
22	0.22	2	0	14	0
23	0	3	0	15	0
24	0.49	4	0	16	0
25	0.01	5	0	17	0.47
26	0	6	0	18	0
27	0	7	0	19	0
28	0.18	8	0	20	0.16
29	0.08	9	0	21	0.41
2012	Precip. (in)	10	0	22	0.12
Mar	sum	11	0.08	23	0.02
1	0	12	0	24	0.01
2	0.04	13	0	25	0.05
3	0	14	0	26	0
4	0	15	0	27	0
5	0.36	16	0.24	28	0
6	0.05	17	0.07	29	0

Date		Precipitation (inches)
	30	0.02
	31	0.15
	2012	Precip. (in)
Jun		sum
	1	0.1
	2	0.02
	3	0
	4	0.03
	5	0.49
	6	0
	7	0.54
	8	0.05
	9	0.02
	10	0
	11	0
	12	0.03
	13	0
	14	0
	15	0
	16	0
	17	0
	18	0.21
	19	0.03
	20	0
	21	0
	22	0.31
	23	0.6
	24	0.01
	25	0
	26	0.01
	27	0
	28	0
	29	0
	30	0
	2012	Precip. (in)
Jul		sum
	1	0
	2	0
	3	0
	4	0
	5	0
	6	0
	7	0
	8	0
	9	0
	10	0
	11	0
	12	0
	13	0
	14	0
	15	0
	16	0
	17	0
	18	0
	19	0
	20	0
	21	0
	22	0
	23	0
	24	0
	25	0
	26	0
	27	0
	28	0
	29	0
	30	0
	31	0
	2012	Precip. (in)
Aug		sum
	1	0
	2	0
	3	0
	4	0
	5	0
	6	0
	7	0
	8	0
	9	0
	10	0
	11	0
	12	0
	13	0
	14	0
	15	0
	16	0
	17	0
	18	0
	19	0
	20	0.61
	21	0
	22	0
	23	0
	24	0
	25	0
	26	0
	27	0
	28	0
	29	0
	30	0
	31	0
	2012	Precip. (in)
Sep		sum
	1	0
	2	0
	3	0
	4	0
	5	0
	6	0
	7	0
	8	0
	9	0
	10	0.02
	11	0
	12	0
	13	0
	14	0
	15	0
	16	0
	17	0
	18	0
	19	0
	20	0
	21	0
	22	0.02
	23	0
	24	0
	25	0
	26	0
	27	0
	28	0
	29	0
	30	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
2012	Precip. (in)	10	0	22	0.12
Oct	sum	11	0.55	23	0.39
1	0	12	0.13	24	0.08
2	0	13	0.19	25	0.41
3	0	14	0	26	0.25
4	0	15	0	27	0.27
5	0	16	0.25	28	0
6	0	17	0.2	29	0.06
7	0	18	0.63	30	0
8	0	19	2.49	31	0
9	0	20	0.22	2013	Precip. (in)
10	0	21	0.52	Jan	sum
11	0	22	0.02	1	0
12	0.09	23	0.95	2	0
13	0.09	24	0	3	0.18
14	0.52	25	0	4	0.07
15	0.22	26	0	5	0.1
16	0	27	0	6	0.03
17	0	28	0.12	7	0.02
18	0.64	29	0.11	8	0.53
19	0.1	30	1.51	9	1.15
20	0.18	2012	Precip. (in)	10	0
21	0.14	Dec	sum	11	0
22	0.26	1	0.28	12	0
23	0	2	1	13	0
24	0.19	3	0.41	14	0
25	0	4	0.46	15	0
26	0.06	5	0.02	16	0
27	0.75	6	0.07	17	0
28	0.26	7	0.14	18	0
29	0.57	8	0	19	0
30	1.2	9	0.06	20	0
31	0.64	10	0	21	0
2012	Precip. (in)	11	0.1	22	0
Nov	sum	12	0.28	23	0.21
1	0.34	13	0.08	24	0.16
2	0.19	14	0.25	25	0.09
3	0.02	15	0.24	26	0.16
4	0.17	16	0.92	27	0.01
5	0.05	17	0.11	28	0.21
6	0.01	18	0.05	29	0.29
7	0	19	0.99	30	0.06
8	0	20	0.64	31	0.08
9	0	21	0.07	2013	Precip. (in)

Date		Precipitation (inches)
Feb		sum
	1	0
	2	0
	3	0.08
	4	0
	5	0.18
	6	0.08
	7	0.09
	8	0
	9	0.01
	10	0
	11	0.01
	12	0
	13	0
	14	0.03
	15	0
	16	0
	17	0
	18	0
	19	0
	20	0.07
	21	0.01
	22	0.34
	23	0
	24	0.02
	25	0.14
	26	0.01
	27	0.32
	28	0.25
	2013	Precip. (in)
Mar		sum
	1	0.04
	2	0.21
	3	0
	4	0
	5	0
	6	0.61
	7	0.26
	8	0
	9	0
	10	0.01
	11	0.03
	12	0.01
	13	0.15
	14	0.05
	15	0
	16	0.04
	17	0
	18	0
	19	0.37
	20	0.72
	21	0.1
	22	0.01
	23	0
	24	0
	25	0
	26	0
	27	0.01
	28	0.06
	29	0.01
	30	0
	31	0
	2013	Precip. (in)
Apr		sum
	1	0
	2	0
	3	0
	4	0.41
	5	0.44
	6	0.44
	7	0.96
	8	0.04
	9	0
	10	0.15
	11	0.09
	12	0.18
	13	0.31
	14	0.06
	15	0
	16	0.07
	17	0
	18	0.18
	19	0.67
	20	0.01
	21	0.03
	22	0
	23	0
	24	0
	25	0
	26	0
	27	0
	28	0.08
	29	0.15
	30	0
	2013	Precip. (in)
May		sum
	1	0
	2	0
	3	0
	4	0
	5	0
	6	0
	7	0
	8	0
	9	0
	10	0
	11	0
	12	0.08
	13	0.11
	14	0
	15	0.03
	16	0
	17	0.02
	18	0
	19	0
	20	0
	21	0.39
	22	0.21
	23	0.08
	24	0.02
	25	0
	26	0.08
	27	0.2
	28	0.01
	29	0.17
	30	0
	31	0
	2013	Precip. (in)
Jun		sum
	1	0
	2	0
	3	0

Date		Precipitation (inches)	Date		Precipitation (inches)	Date		Precipitation (inches)
	4	0		16	0		27	0
	5	0		17	0		28	0
	6	0		18	0		29	0.38
	7	0		19	0		30	0
	8	0		20	0		31	0
	9	0		21	0		2013	Precip. (in)
	10	0		22	0	Sep		sum
	11	0		23	0		1	0
	12	0		24	0		2	0
	13	0		25	0		3	0.12
	14	0		26	0		4	0
	15	0		27	0		5	0.46
	16	0		28	0		6	1.08
	17	0		29	0		7	0
	18	0		30	0		8	0.01
	19	0		31	0		9	0
	20	0		2013	Precip. (in)		10	0
	21	0.01	Aug		sum		11	0
	22	0		1	0		12	0
	23	0		2	0		13	0
	24	0.01		3	0		14	0
	25	0.01		4	0		15	0.21
	26	0.56		5	0		16	0
	27	0.13		6	0		17	0
	28	0		7	0		18	0
	29	0		8	0		19	0
	30	0		9	0		20	0.15
	2013	Precip. (in)		10	0		21	0.01
Jul		sum		11	0		22	0.37
	1	0		12	0		23	0.08
	2	0		13	0		24	0.01
	3	0		14	0		25	0.04
	4	0		15	0		26	0.01
	5	0		16	0		27	0.05
	6	0		17	0		28	1.21
	7	0		18	0		29	0.62
	8	0		19	0		30	0.63
	9	0		20	0		2013	Precip. (in)
	10	0		21	0	Oct		sum
	11	0		22	0		1	0.08
	12	0		23	0		2	0.19
	13	0		24	0		3	0.02
	14	0		25	0		4	0.01
	15	0		26	0		5	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
6	0.04	17	0.05	29	0
7	0.1	18	0.8	30	0.02
8	0.39	19	0.11	31	0.01
9	0	20	0	2014	Precip. (in)
10	0.03	21	0	Jan	sum
11	0.53	22	0	1	0.01
12	0.06	23	0.08	2	0.53
13	0	24	0	3	0.03
14	0.01	25	0	4	0
15	0	26	0	5	0
16	0	27	0	6	0
17	0.01	28	0	7	0.34
18	0	29	0.01	8	0.44
19	0	30	0.06	9	0.09
20	0	2013	Precip. (in)	10	0.15
21	0	Dec	sum	11	0.91
22	0	1	0.03	12	0.02
23	0.01	2	0.11	13	0.01
24	0.01	3	0.01	14	0
25	0	4	0	15	0
26	0.01	5	0	16	0
27	0.06	6	0	17	0
28	0	7	0	18	0
29	0	8	0	19	0
30	0.01	9	0	20	0
31	0.01	10	0	21	0
2013	Precip. (in)	11	0	22	0
Nov	sum	12	0.22	23	0
1	0	13	0.01	24	0
2	0.38	14	0	25	0
3	0.02	15	0.03	26	0
4	0.01	16	0	27	0
5	0.05	17	0	28	0.35
6	0.09	18	0.04	29	0.77
7	0.94	19	0	30	0.01
8	0	20	0.1	31	0.03
9	0.09	21	0.22	2014	Precip. (in)
10	0	22	0.21	Feb	sum
11	0	23	0.01	1	0.02
12	0.14	24	0	2	0
13	0	25	0	3	0
14	0.01	26	0	4	0
15	0.08	27	0.03	5	0
16	0	28	0	6	0

Precipitation Data – King County International Airport/Boeing Field -12

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
7	0	21	0	May	sum
8	0.09	22	0	1	0
9	0.01	23	0	2	0
10	0.54	24	0	3	1.19
11	0.75	25	0.22	4	0.26
12	0.14	26	0.06	5	0.24
13	0	27	0.03	6	0
14	0.41	28	0.51	7	0
15	0.51	29	0.63	8	0.32
16	1.41	30	0.02	9	0.07
17	0.44	31	0	10	0
18	0.62	2014	Precip. (in)	11	0.01
19	0.02	Apr	sum	12	0
20	0.03	1	0	13	0
21	0.23	2	0	14	0
22	0.09	3	0.11	15	0
23	0.18	4	0	16	0
24	0.39	5	0.08	17	0
25	0	6	0	18	0.04
26	0	7	0	19	0
27	0	8	0.37	20	0
28	0	9	0.01	21	0
2014	Precip. (in)	10	0	22	0
Mar	sum	11	0	23	0.16
1	0.01	12	0	24	0
2	0.7	13	0	25	0.27
3	0.37	14	0	26	0.01
4	0.41	15	0.01	27	0
5	1.44	16	0.41	28	0.03
6	0.21	17	0.7	29	0
7	0	18	0	30	0
8	1.12	19	0.36	31	0
9	0.26	20	0	2014	Precip. (in)
10	0.44	21	0.14	Jun	sum
11	0	22	0.53	1	0
12	0	23	0.22	2	0
13	0	24	0.3	3	0
14	0.11	25	0.05	4	0
15	0.2	26	0.18	5	0
16	1.09	27	0	6	0
17	0.01	28	0	7	0
18	0.01	29	0	8	0
19	0	30	0	9	0
20	0	2014	Precip. (in)	10	0

Date		Precipitation (inches)	Date		Precipitation (inches)	Date		Precipitation (inches)
	11	0		23	0		1	0
	12	0		24	0		2	0
	13	0.03		25	0		3	0
	14	0		26	0		4	0
	15	0.01		27	0		5	0
	16	0.11		28	0		6	0
	17	0.05		29	0		7	0
	18	0		30	0		8	0
	19	0		31	0		9	0
	20	0		2014	Precip. (in)		10	0
	21	0	Aug		sum		11	0
	22	0		1	0		12	0
	23	0		2	0		13	0
	24	0		3	0		14	0
	25	0		4	0		15	0
	26	0		5	0		16	0
	27	0		6	0		17	0
	28	0		7	0		18	0
	29	0		8	0		19	0
	30	0		9	0		20	0
	2014	Precip. (in)		10	0		21	0
Jul		sum		11	0		22	0
	1	0		12	0		23	0
	2	0		13	0		24	0.66
	3	0		14	0		25	0.27
	4	0		15	0		26	0.09
	5	0		16	0		27	0
	6	0		17	0		28	0
	7	0		18	0		29	0
	8	0		19	0		30	0
	9	0		20	0		2014	Precip. (in)
	10	0		21	0	Oct		sum
	11	0		22	0		1	0
	12	0		23	0		2	0
	13	0		24	0		3	0
	14	0		25	0		4	0
	15	0		26	0		5	0
	16	0		27	0		6	0
	17	0		28	0		7	0
	18	0		29	0		8	0
	19	0		30	0		9	0
	20	0		31	0		10	0
	21	0		2014	Precip. (in)		11	0
	22	0	Sep		sum		12	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
13	0	24	0.01	3	0
14	0.11	25	0.33	4	0.22
15	0.45	26	0.01	5	0.07
16	0	27	0.04	6	0.01
17	0.14	28	1.39	7	0
18	0.31	29	0.06	8	0
19	0	30	0	9	0.01
20	0.44	2014	Precip. (in)	10	0.18
21	0.1	Dec	sum	11	0.06
22	1.43	1	0	12	0
23	0.35	2	0	13	0
24	0.13	3	0	14	0
25	0.37	4	0.05	15	0.43
26	0.05	5	0.09	16	0
27	0.01	6	0.25	17	0.76
28	0.34	7	0	18	0.23
29	0.04	8	0.45	19	0.03
30	0.67	9	0.42	20	0
31	0.77	10	0.5	21	0
2014	Precip. (in)	11	0.33	22	0.03
Nov	sum	12	0	23	0.08
1	0	13	0.01	24	0.02
2	0.11	14	0	25	0.01
3	0.24	15	0	26	0
4	0.05	16	0	27	0.02
5	0.27	17	0.16	28	0
6	0.22	18	0.6	29	0
7	0	19	0.13	30	0
8	0	20	0.6	31	0
9	0.29	21	0	2015	Precip. (in)
10	0	22	0	Feb	sum
11	0	23	0.61	1	0.04
12	0	24	0.12	2	0.3
13	0	25	0	3	0.03
14	0	26	0	4	0.3
15	0	27	0.12	5	0.87
16	0	28	0.06	6	0.75
17	0	29	0	7	0.82
18	0	30	0	8	0.15
19	0	31	0	9	0.15
20	0.11	2015	Precip. (in)	10	0.02
21	0.67	Jan	sum	11	0
22	0.03	1	0	12	0.02
23	0.42	2	0.03	13	0

Date		Precipitation (inches)	Date		Precipitation (inches)	Date		Precipitation (inches)
	14	0.05		28	0		7	0
	15	0		29	0		8	0
	16	0		30	0.02		9	0
	17	0		31	0.31		10	0
	18	0		2015	Precip. (in)		11	0
	19	0.03	Apr		sum		12	0.11
	20	0.02		1	0.05		13	0.14
	21	0		2	0		14	0
	22	0		3	0.05		15	0.01
	23	0		4	0		16	0
	24	0		5	0		17	0
	25	0.07		6	0		18	0
	26	0.22		7	0.01		19	0
	27	0.73		8	0		20	0
	28	0		9	0		21	0
	2015	Precip. (in)		10	0.52		22	0
Mar		sum		11	0.02		23	0
	1	0		12	0		24	0
	2	0		13	0.46		25	0
	3	0		14	0.05		26	0
	4	0		15	0		27	0
	5	0		16	0		28	0
	6	0		17	0		29	0
	7	0		18	0		30	0
	8	0		19	0		31	0
	9	0		20	0		2015	Precip. (in)
	10	0		21	0.16	Jun		sum
	11	0.09		22	0		1	0.09
	12	0		23	0.1		2	0
	13	0.04		24	0.15		3	0
	14	0.54		25	0.01		4	0
	15	2.2		26	0		5	0
	16	0		27	0		6	0
	17	0.03		28	0.11		7	0
	18	0		29	0.01		8	0
	19	0.01		30	0		9	0
	20	0.12		2015	Precip. (in)		10	0
	21	0.13	May		sum		11	0
	22	0.07		1	0		12	0
	23	0.2		2	0		13	0
	24	0.27		3	0		14	0
	25	0.15		4	0		15	0
	26	0		5	0.18		16	0
	27	0.01		6	0		17	0

Date		Precipitation (inches)	Date		Precipitation (inches)	Date		Precipitation (inches)
	18	0		30	0		8	0
	19	0.07		31	0		9	0
	20	0		2015	Precip. (in)		10	0.01
	21	0	Aug		sum		11	0
	22	0		1	0		12	0
	23	0		2	0		13	0.03
	24	0		3	0		14	0
	25	0		4	0		15	0
	26	0		5	0		16	0.04
	27	0		6	0		17	0.58
	28	0		7	0		18	0.01
	29	0.01		8	0		19	0
	30	0		9	0		20	0.09
	2015	Precip. (in)		10	0		21	0
Jul		sum		11	0		22	0
	1	0		12	0.04		23	0
	2	0		13	0		24	0
	3	0		14	0.57		25	0.03
	4	0		15	0		26	0
	5	0		16	0		27	0
	6	0		17	0		28	0
	7	0		18	0		29	0
	8	0		19	0		30	0
	9	0		20	0		2015	Precip. (in)
	10	0		21	0	Oct		sum
	11	0		22	0		1	0.01
	12	0		23	0		2	0
	13	0		24	0		3	0
	14	0		25	0		4	0
	15	0		26	0		5	0
	16	0		27	0		6	0.01
	17	0		28	0.01		7	0.38
	18	0		29	0.18		8	0
	19	0		30	0.24		9	0.01
	20	0		31	0.06		10	0.77
	21	0.13		2015	Precip. (in)		11	0
	22	0	Sep		sum		12	0.34
	23	0		1	0.17		13	0.07
	24	0.01		2	0.02		14	0
	25	0.02		3	0		15	0
	26	0.1		4	0		16	0.01
	27	0.01		5	0.06		17	0.04
	28	0		6	0.19		18	0.16
	29	0		7	0		19	0

Date	Precipitation (inches)	Date	Precipitation (inches)	Date	Precipitation (inches)
20	0	2015	Precip. (in)	10	0
21	0	Dec	sum	11	0.09
22	0.01	1	0.39	12	0.52
23	0	2	0.06	13	0.57
24	0.01	3	0.52	14	0
25	0.35	4	0.12	15	0.04
26	0.09	5	0.81	16	0.41
27	0.01	6	0.55	17	0.32
28	0.1	7	1.06	18	0.05
29	0.02	8	1.51	19	0.46
30	0.36	9	0.56	20	0.2
31	0.99	10	0.63	21	1.27
2015	Precip. (in)	11	0.01	22	0.27
Nov	sum	12	0.56	23	0.53
1	0.5	13	0.11	24	0
2	0.07	14	0	25	0
3	0.07	15	0.02		
4	0	16	0.13		
5	0.01	17	0.82		
6	0.01	18	0.54		
7	0.49	19	0.01		
8	0.38	20	0.19		
9	0.16	21	0.83		
10	0.06	22	0.12		
11	0.05	23	0.09		
12	0.24	24	0.11		
13	1.31	25	0.05		
14	1.64	26	0		
15	0.75	27	0.32		
16	0.09	28	0.03		
17	0.74	29	0		
18	0.03	30	0		
19	0.08	31	0		
20	0	2016	Precip. (in)		
21	0	Jan	sum		
22	0	1	0		
23	0.12	2	0		
24	0.21	3	0.01		
25	0	4	0.07		
26	0	5	0.11		
27	0	6	0		
28	0	7	0		
29	0	8	0		
30	0.01	9	0		